

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

DAVID KUHLMAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

HCF MANAGEMENT, INC., and HCF OF
FAIRVIEW, INC., d/b/a FAIRVIEW
MANOR,

Defendant.

Case No.: 3:25-cv-111

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

PLEASE TAKE NOTICE THAT, pursuant to Fed. R. Civ. P. 41(a)(1)(A), Plaintiff David Kuhlman, individually and on behalf of all others similarly situated ("Plaintiff") hereby voluntarily dismisses Defendants HCF Management, Inc. and HCF of Fairview, Inc. d/b/a Fairview Manor, ("Defendants") without prejudice.

Date: March 4, 2025,

Respectfully submitted,

/s/Joshua Sanford

Joshua Sanford

Arkansas Bar No. 2001037

josh@sanfordlaw.com

SANFORD LAW FIRM, PLLC

10800 Financial Centre Pkwy, Suite 510

Little Rock, Arkansas 72211

Phone: (501) 221-0088

Leigh S. Montgomery

Texas Bar No. 24052214

lmontgomery@eksm.com

EKSM, LLP

4200 Montrose Blvd., Suite 200

Houston, Texas 77006

Phone: (888) 350-3931

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on March 4, 2025, a copy of the foregoing document was filed and served on all parties in accordance with the protocols for e-filing in the Federal Rules of Civil Procedure.

/s/Joshua Sanford
Joshua Sanford